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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 BURKE CONSTRUCTION GROUP, INC.,

Case No.: 3:20-cv-00195-LRH-WGC

9 Plaintiff(s),

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT TO FILE
RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

10 v.

11 NAVIGATORS SPECIALTY INSURANCE
12 COMPANY, And DOES 1 through 25,
13 Inclusive,

(First Request)

14 Defendant(s).

15 Plaintiff, Burke Construction Group, Inc. ("Plaintiff"), by and through its counsel of record,
16 Stephen G. Castronova, Esq. of CASTRONOVA LAW OFFICES, PC; and Defendant, Navigators
17 Specialty Insurance Company ("Defendant"), by and through its counsel of record, Chad C.
18 Butterfield, Esq. of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP, hereby stipulate and agree
19 to extend the deadline for Defendant to file a responsive pleading to Plaintiff's Complaint by thirty
20 (30) days, from April 6, 2020 to **May 6, 2020**.

21 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the
22 requested extension, as the parties are attempting to negotiate a resolution of this action.
23 Accordingly, the parties agree that the requested extension furthers the interests of this litigation
24 and is not being requested in bad faith or to delay these proceedings unnecessarily.

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1 This is the parties' first request for extension of the deadline.

2 DATED this 6th day of April, 2020.

3 **WILSON, ELSER, MOSKOWITZ,**
4 **EDELMAN & DICKER LLP**

5 /s/ Chad C. Butterfield
6 CHAD C. BUTTERFIELD
7 Nevada Bar No. 10532
8 300 South Fourth Street, 11th Floor
9 Las Vegas, NV 89101
10 *Attorneys for Defendant Navigators Specialty*
11 *Insurance Company*

12 DATED this 6th day of April, 2020.

13 **CASTRONOVA LAW OFFICES, PC**

14 /s/ Stephen G. Castronova
15 STEPHEN G. CASTRONOVA, ESQ.
16 Nevada Bar No. 7305
17 605 Forest Street
18 Reno, NV 89509
19 *Attorney for Plaintiff Burke Construction*
20 *Group, Inc.*

21 **ORDER**

22 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

23 Dated: April 6, 2020.

24 William G. Cobb
25 UNITED STATES MAGISTRATE JUDGE
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